

**PARTIES RECEIVING THIS NOTICE OF THIRTEENTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Shai Y Waisman  
Randi W. Singer

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
: **Debtors.** : **(Jointly Administered)**  
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**NOTICE OF HEARING ON DEBTORS' THIRTEENTH  
OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVELY DUPLICATIVE CLAIMS)**

**PLEASE TAKE NOTICE** that on May 18, 2010, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), filed their thirteenth omnibus objection to claims (the "Debtors' Thirteenth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Debtors' Thirteenth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New

York 10004, on **June 29, 2010 at 11:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Debtors’

Thirteenth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Shai Waisman, Esq.); (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than **June 17, 2010 at 4:00 p.m. (Eastern Time)** (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Debtors’ Thirteenth Omnibus Objection to Claims or any claim set

forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' Thirteenth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: May 18, 2010  
New York, New York

/s/ Shai Y. Waisman

Shai Y. Waisman  
Randi W. Singer

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Shai Y. Waisman  
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Attorneys for Debtors and  
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**DEBTORS' THIRTEENTH OMNIBUS  
OBJECTION TO CLAIMS (SUBSTANTIVELY DUPLICATIVE CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE  
CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING  
THIS OBJECTION SHOULD LOCATE THEIR NAMES AND  
CLAIMS ON THE EXHIBIT ATTACHED TO THIS OBJECTION.**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
DEBTORS' COUNSEL, ERIN ECKOLS, AT (214) 746-7700.**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors, in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), respectfully represent:

**Relief Requested**

1. The Debtors file this thirteenth omnibus objection to claims (the “Thirteenth Omnibus Objection to Claims”) pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [Docket No. 6664], seeking entry of an order disallowing and expunging the claims listed on Exhibit A annexed hereto.

2. The Debtors have examined the proofs of claim identified on Exhibit A and have determined that the proofs of claim listed under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Substantively Duplicative Claims”) are duplicative, in substance, of the corresponding claims identified under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”). The Debtors seek the disallowance and expungement from the Court’s claims register of the Substantively Duplicative Claims and preservation of the Debtors’ right to later object to any Surviving Claim on any other basis.

3. This Thirteenth Omnibus Objection to Claims does not affect any of the Surviving Claims and does not constitute any admission or finding with respect to

any of the Surviving Claims. Further, the Debtors reserve all their rights to object on any other basis to any Substantively Duplicative Claim as to which the Court does not grant the relief requested herein.

#### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

#### **Background**

5. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of title 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On September 17, 2008, the United States Trustee for the Southern District of New York (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

**The Substantively Duplicative Claims Should Be Disallowed and Expunged**

9. The Debtors have begun their review of the claims filed on the claims register in these cases and maintained by the Court-appointed claims agent and have identified the claims on Exhibit A and have determined that the Substantively Duplicative Claims, although not exact duplicates, are in substance duplicates of the corresponding Surviving Claims. Specifically, the Substantively Duplicative Claims were filed by the same claimants against the same Debtors, in most instances for the same dollar amounts, on account of the same obligations as the corresponding Surviving Claims, and provided no additional supporting documentation for the Surviving Claims.

10. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

11. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.”

11 U.S.C. § 502(b)(1). Accordingly, courts in the Southern District of New York routinely disallow and expunge duplicative claims filed by the same creditor against the same debtors. *See, e.g., In re Worldcom, Inc.*, Case No. 02-13533 (AJG), 2005 WL 3875191, at \*8 (Bankr. S.D.N.Y. June 3, 2005) (expunging duplicate claim); *In re Best Payphones, Inc.*, Case No. 01-15472, 2002 WL 31767796, at \*4, 11 (Bankr. S.D.N.Y. Dec. 11, 2002) (expunging duplicate claim); *In re Drexel Burnham Lambert Group, Inc.*, 148 B.R. 993, 1001-02 (S.D.N.Y. 1992) (dismissing duplicate claim).

12. The Debtors cannot be required to pay on the same claim more than once. *See, e.g., In re Finley, Kumble, Wagner, Heine, Underberg, Manley, Myerson, & Casey*, 160 B.R. 882, 894 (Bankr. S.D.N.Y. 1993) (“In bankruptcy, multiple recoveries for an identical injury are generally disallowed.”). Elimination of redundant claims will also enable the Debtors to maintain a claims register that more accurately reflects the proper claims existing against the Debtors.

13. Accordingly, to avoid the possibility of a creditor receiving duplicative or multiple recoveries on its claim, the Debtors request that the Court disallow and expunge in their entirety the Substantively Duplicative Claims listed on Exhibit A. The Surviving Claims will remain on the claims register subject to further objections on any other basis.

#### **Notice**

14. No trustee has been appointed in these chapter 11 cases. Notice of this Thirteenth Omnibus Objection to Claims has been provided to (i) each claimant listed on Exhibit A; (ii) the U.S. Trustee; (iii) the attorneys for the Creditors’ Committee; (iv) the Securities and Exchange Commission; (v) the Internal Revenue Service; and



(vi) the United States Attorney for the Southern District of New York, in accordance with the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures, dated February 13, 2009 [Docket No. 2837] and the Procedures Order. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

15. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: May 18, 2010  
New York, New York

/s/ Shai Y. Waisman  
Shai Y. Waisman  
Randi W. Singer

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

# EXHIBIT A

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
1	ANDERSEN, SVEN SCHOPENHAUERSTRASS E 10 FRANKFURT AM MAIN, 60316 GERMANY	08/19/2009		8730	\$305,377.00	ANDERSEN, SVEN SCHOPENHAUERSTRASSE 10 FRANKFURT AM MAIN, 60316 GERMANY	08/19/2009	08-13555 (JMP)	8731	\$305,377.00
2	AXIS BROKERAGE, LP 19855 SOUTHWEST FREEWAY SUITE 250 SUGAR LAND, TX 77479	08/03/2009		7062	\$3,670.00	AXIS BROKERAGE, LP 19855 SOUTHWEST FREEWAY SUITE 250 SUGAR LAND, TX 77479	12/29/2008	08-13885 (JMP)	1491	\$3,670.00
3	BAER, MELVIN 89 NORTH STREET TOPSFIELD, MA 01983	07/15/2009		5351	\$23,850.00	BAER, MELVIN A. 89 NORTH STREET TOPSFIELD, MA 01983	07/15/2009	08-13555 (JMP)	5347	\$23,850.00
4	BDP LIMITED PO BOX 83 ORDNANCE HOUSE 31 PIER ROAD JERSEY, JE4 8PW UNITED KINGDOM	10/19/2009	08-13555 (JMP)	41338	\$19,200,000.00	BDP LIMITED PO BOX 83 ORDNANCE HOUSE 31 PIER ROAD JERSEY, JE4 8PW UNITED KINGDOM	10/19/2009	08-13555 (JMP)	41335	\$19,200,000.00
5	BETHKE, FRAU JNGEBURG GERBSTEDTER STR 45. HETTSTEDT, 06333 GERMANY	08/05/2009		7375	Undetermined	BETHKE, FRAU JNGEBURG GERBSTEDTER STR. 45 HETTSTEDT, 06333 GERMANY	03/24/2009	08-13555 (JMP)	3480	Undetermined

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
6	BIGOTT, CARLOS 1111 BRICKELL AVE, SUITE 1400 (CREDIT SUISSE) MIAMI, FL 33131	07/17/2009		5510	\$10,625.00	BIGOTT, CARLOS 1111 BRICKELL AVE, SUITE 1400 (CREDIT SUISSE) MIAMI, FL 33131	10/30/2008	08-13555 (JMP)	437	\$10,625.00
7	BRVELL, NATASHA 27 CROCKERTON ROAD LONDON, SW17 7HE UNITED KINGDOM	10/20/2009	08-13555 (JMP)	42717	\$8,224.00	BRVELL, NATASHA 27 CROCKERTON ROAD LONDON, SW17 7HE UNITED KINGDOM	10/20/2009	08-13555 (JMP)	42710	\$8,224.00
8	CORNICK, JACK A 707 ALDER ST. EDMONDS, WA 98020	07/23/2009		5967	\$50,280.00	CORNICK, JACK A. 707 ALDER ST. EDMONDS, WA 98020	01/26/2009	08-13555 (JMP)	1950	\$50,280.00
9	DEFINED RETURNS LIMITED (IN ADMINSTRATION) C/O GRAMT THORNTON UK LLP 30 FINSBURY SQUARE LONDON, EC2P 2YO UNITED KINGDOM	10/30/2009	08-13555 (JMP)	59118	\$62,011,874.40	DEFINED RETURNS LIMITED ON BEHALF OF UNDERLYING INVESTORS (IN ADMINISTRATION) C/O GRANT THORNTON UK LLP 30 FINSBURY SQUARE LONDON, EC2P 2YO UNITED KINGDOM	10/30/2009	08-13555 (JMP)	59120	\$71,911,874.40
10	DIRECT FX LIMITED P.O. BOX 11897 WELLINGTON, NEW ZEALAND, 6142 NEW ZEALAND	09/09/2009		10980	Undetermined	DIRECT FX DIRECT FX LIMITED P.O. BOX 11897 WELLINGTON, 6142 NEW ZEALAND	09/09/2009	08-13901 (JMP)	10979	\$27,067.83

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
11	GOLLIN, MARK FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE SURREY COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15131	\$792,128.00	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE SURREY COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15134	\$792,128.00
12	GOLLIN, MARK D FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15133	\$792,128.00	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE SURREY COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15134	\$792,128.00
13	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE COBHAM, SURREY, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15132	\$792,128.00*	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE SURREY COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15134	\$792,128.00
14	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15130	\$792,128.00	GOLLIN, MARK D. FIRTH HOUSE, HATCHFORD PARK OCKHAM LANE SURREY COBHAM, KT11 1LR UNITED KINGDOM	09/17/2009	08-13555 (JMP)	15134	\$792,128.00

\* - Indicates claim contains unliquidated and/or undetermined amounts

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
15	HERSHMAN HOLDINGS LLC 1 HOLLOW LANE LAKE SUCCESS, NY 11042- 1215	09/17/2009		15752	\$87,525.00	HERSHMAN HOLDINGS LLC 1 HOLLOW LANE LAKE SUCCESS, NY 11042- 1215	01/29/2009	08-13555 (JMP)	2152	\$87,525.00
16	HEVER CASTLE LTD HEVER EDENBRIDGE, TN8 7NG UNITED KINGDOM	10/02/2009		36114	\$5,372.10	HEVER CASTLE LTD HEVER EDENBRIDGE, TN8 7NG UNITED KINGDOM	10/02/2009		36113	\$5,372.10
17	HORNE, CATHY 971 FAIRMONT PARK DRIVE DACULA, GA 30019-6546	09/18/2009		18357	Undetermined	HORNE, CATHY 971 FAIRMONT PARK DRIVE DACULA, GA 30019	09/18/2009	08-13555 (JMP)	18359	\$14,269.22
18	JANKOWSKI, JANICE A. 1445 MAPLE STREET GLENVIEW, IL 60025	09/11/2009		11529	\$3,714.00*	JANKOWSKI, JANICE A. 1445 MAPLE STREET GLENVIEW, IL 60025	09/11/2009	08-13555 (JMP)	11530	\$3,714.00*

\* - Indicates claim contains unliquidated and/or undetermined amounts

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
19	LEHMAN BROTHERS SECURITIES N.V. MICHIEL GORSIRA, AS BANKRUPTCY TRUSTEE FOR LEHMAN BROTHERS SECURITIES N.V. C/O VANEPS KUNNERMAN VANDOOME CURACAO, NETHERLANDS ANTILLES	10/30/2009	08-13555 (JMP)	58654	\$100,589,377.71*	LEHMAN BROTHERS SECURITIES N.V. MICHIEL GORSIRA, AS BANKRUPTCY TRUSTEE FOR LEHMAN BROTHERS SECURITIES N.V. C/O VANEPS KUNNERMAN VANDOOME CURACAO, NETHERLANDS	10/30/2009	08-13555 (JMP)	58655	\$272,026,097.82*
20	LEHMAN BROTHERS TREASURY CO. B.V. RUTGER SCHIMMELPENNINCK AND FREDERIC VERHOEVEN AS BANKRUPTCY TRUSTEES ("CURATOREN") FOR LEHMAN BROTHERS TREASURY CO. B.V. AMSTERDAM, NL-1070 NETHERLANDS	10/30/2009	08-13555 (JMP)	58610	\$37,566,349.39*	LEHMAN BROTHERS TREASURY CO. B.V. RUTGER SCHIMMELPENNINCK AND FREDERIC VERHOEVEN AS BANKRUPTCY TRUSTEES ("CURATOREN") FOR LEHMAN BROTHERS TREASURY C/O HOUTHOF BURUMA N.V. AMSTERDAM, NL-1070 NETHERLANDS	10/30/2009	08-13555 (JMP)	58611	\$38,413,246.93*

\* - Indicates claim contains unliquidated and/or undetermined amounts

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
21	NEWMAN, MARK H FLAT 7 44 SLOANE STREET LONDON, SW1X 9LU UNITED KINGDOM	09/18/2009		18905	\$9,150,000.00	NEWMAN, MARK H FLAT 7 44 SLOANE STREET LONDON, SW1X 9LU UNITED KINGDOM	09/18/2009	08-13555 (JMP)	18339	\$9,150,000.00
22	NEWMAN, MARK H FLAT 7 44 SLOANE STREET LONDON, GT LON, SW1X 9LU UNITED KINGDOM	09/18/2009		18340	Undetermined	NEWMAN, MARK H FLAT 7 44 SLOANE STREET LONDON, SW1X 9LU UNITED KINGDOM	09/18/2009	08-13555 (JMP)	18339	\$9,150,000.00
23	PALOMA INDUSTRIES NOGATA PLANT LTD C/O AUTUMN D. HIGHSMITH 2323 VICTORY AVE., STE 700 DALLAS, TX 75219-7673	09/18/2009	08-13555 (JMP)	16849	\$16,000,000.00*	PALOMA INDUSTRIES NOGATA PLANT LTD C/O AUTUMN D. HIGHSMITH 2323 VICTORY AVE., STE 700 DALLAS, TX 75219-7673	09/18/2009	08-13555 (JMP)	16850	\$16,000,000.00*
24	SUERTH, MICHAEL CLEMENS-AUGUST- PLATZ 10 MUENSTER, 48167 GERMANY	10/28/2009		50244	\$7,462.50	SUERTH, MICHAEL CLEMENS-AUGUST-PLATZ 10 MUENSTER, 48167 GERMANY	10/28/2009	08-13555 (JMP)	50243	\$7,462.50
25	TUOSTO, JOHN 78 NOTTINGHAM WAY JACKSON, NJ 08527	09/22/2009		32706	\$299,996.00	TUOSTO, JOHN 78 NOTTINGHAM WAY JACKSON, NJ 08527	09/22/2009	08-13555 (JMP)	32705	\$299,996.00

\* - Indicates claim contains unliquidated and/or undetermined amounts



## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
26	VAN HOLTHE, SAMUEL L LEIGH HOUSE WITHERENDEN HILL BURWASH ETCHINGHAM, TN19 7EA UNITED KINGDOM	09/18/2009		17757	\$2,148,649.69	VAN HOLTHE, SAMUEL L TREEMANS TREEMANS ROAD HORSTED KEYNES,W SUSX, RH17 7EA UNITED KINGDOM	09/18/2009		17793	\$2,148,649.69
27	VAN HOLTHE, SAMUEL L LEIGH HOUSE WITHERENDEN HILL BURWASH ETCHINGHAM, TN19 7EA UNITED KINGDOM	09/18/2009	08-13555 (JMP)	17794	\$2,148,649.69	VAN HOLTHE, SAMUEL L TREEMANS TREEMANS ROAD HORSTED KEYNES,W SUSX, RH17 7EA UNITED KINGDOM	09/18/2009		17793	\$2,148,649.69
28	VAN HOLTHE,SAMUEL L LEIGH HOUSE WITHERENDEN HILL BURWASH ETCHINGHAM, E.SUSX, TN19 7EA UNITED KINGDOM	09/18/2009		17795	\$2,148,649.69	VAN HOLTHE, SAMUEL L TREEMANS TREEMANS ROAD HORSTED KEYNES,W SUSX, RH17 7EA UNITED KINGDOM	09/18/2009		17793	\$2,148,649.69
29	WANG, ROBERTO Y 52 WEST HOMESTEAD AVENUE PALISADES PARK, NJ 07650	09/04/2009		10332	\$7,686.10	WANG, ROBERTO Y 52 WEST HOMESTEAD AVENUE PALISADES PARK, NJ 07650	09/04/2009	08-13555 (JMP)	10331	\$7,686.10
30	WEBSTER, KEITH W. 6735 ALTAMOR DRIVE LOS ANGELES, CA 90045	07/20/2009		5753	\$112,786.22	WEBSTER, KEITH W. 6735 ALTAMOR DRIVE LOS ANGELES, CA 90045	07/20/2009	08-13555 (JMP)	5754	\$112,786.22

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 13 : EXHIBIT A - SUBSTANTIVELY DUPLICATE CLAIMS

## CLAIMS TO BE DISALLOWED AND EXPUNGED

## SURVIVING CLAIMS

NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
TOTAL				\$255,058,630.49					

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
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**ORDER GRANTING DEBTORS' THIRTEENTH OMNIBUS  
OBJECTION TO CLAIMS (SUBSTANTIVELY DUPLICATIVE CLAIMS)**

Upon the thirteenth omnibus objection to claims, dated May 18, 2010 (the "Thirteenth Omnibus Objection to Claims"),<sup>1</sup> of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), seeking entry of an order, pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], disallowing and expunging the Substantively Duplicative Claims on the grounds that such claims are duplicative of the corresponding Surviving Claims, all as more fully described in the Thirteenth Omnibus Objection to Claims; and due and proper notice of the Thirteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Thirteenth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Thirteenth Omnibus Objection to Claims.

bases set forth in the Thirteenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Thirteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Substantively Duplicative Claims”) are disallowed and expunged; and it is further

ORDERED that the claims listed on Exhibit 1 annexed hereto under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”) will remain on the claims register subject to the Debtors’ right to further object as set forth herein; and it is further

ORDERED that this Order supersedes all previous orders regarding the disposition of the Substantively Duplicative Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that all information included on and all documentation filed in support of any Substantively Duplicative Claims, including, but not limited to, derivative and guarantee questionnaires and supporting documentation, shall be treated as having been filed in support of the corresponding Surviving Claims; and is further

ORDERED that nothing in this Order or disallowance and expungement of the Substantively Duplicative Claims constitutes any admission or finding with respect to any of the Surviving Claims, and the Debtors’ rights to object to the Surviving Claims

on any basis is preserved; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Thirteenth Omnibus Objection to Claims under the heading “*Claims to be Disallowed and Expunged*” that is not listed on Exhibit 1 annexed hereto and (ii) any Surviving Claim; *provided, however*, that if the Court subsequently orders that a Surviving Claim is not appropriately duplicative of the corresponding Substantively Duplicative Claim, then the claims agent shall be authorized and directed to immediately reinstate such Substantively Duplicative Claim in these chapter 11 cases (the “Reinstated Claim”) and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2010  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE